

## EXHIBIT K

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

YELLOWCAKE, INC., a California  
Corporation,  
Plaintiff,

v.

Case No:

HYPHY MUSIC, INC.,  
Defendant.

1:20-CV-00988-DAD-BAM

HYPHY MUSIC, INC.,  
Counterclaimant,

v.

YELLOWCAKE, INC, COLONIZE MEDIA,  
INC., JOSE DAVID HERNANDEZ,  
JESUS CHAVES, SR.,  
Counterdefendants.

VIDEOTAPED DEPOSITION OF DOMINGO TORRES FLORES

DATE: Wednesday, December 7, 2022

TIME: 1:14 p.m.

REPORTED BY: Jaime Godinez

JOB No.: 13846

Conducted by videoconference via the Remote Legal  
platform



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646-461-3400

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1 A At the bottom, yes.

2 Q Okay. Does he recognize either of these two  
3 signatures?

4 A At the bottom, yes.

5 Q Does he recognize -- does he recognize either  
6 of the two signatures on the document to be his  
7 signature?

8 A Well, it looks like it, you know.

9 Q Okay. Does he recall ever signing this  
10 document?

11 A Me? No. I don't remember anymore. No, no,  
12 no.

13 Q My question is did he sign this document?

14 A Well, I don't know what it says. How could I  
15 sign it?

16 Q The question is yes or no, did he sign this  
17 document?

18 A I'm not sure, you know. I'd have to see  
19 the -- the signature better.

20 Q Does he recall ever signing any document with  
21 Hyphy music as the other party to the document?

22 A Where I give the rights, the masters, that's  
23 my part.

24 Q Could you ask him to explain -- okay.  
25 Withdrawn.

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1 Do you recall having a meeting with Mr. Vargas  
2 and Mr. Martinez at the offices of Hyphy Music in or  
3 about March of 2022?

4 A Around then? Yes, no, I don't remember, but  
5 maybe, yes. My son's here with me. He's the one who  
6 knows. I don't know.

7 Q I'm asking if he knows. He can answer the  
8 question.

9 A I didn't hear it.

10 Q Does he recall meeting with Mr. Vargas and Mr.  
11 Martinez at the offices of Hyphy Music in or about March  
12 22, 2022?

13 A I don't remember. My son -- my son's the one  
14 who knows.

15 Q Tell him again I'm not asking what his son  
16 knows. I'm asking what he remembers. He doesn't  
17 remember there was such a meeting?

18 A Yes. We've had meetings, but I don't know the  
19 date.

20 Q And what were the meetings about?

21 A I don't remember.

22 Q Okay. Who was at these meetings?

23 A Well, perhaps it would have been my son  
24 because he's the only one who goes with me.

25 Q Was Mr. Vargas at any of these meetings?



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1 to him -- withdrawn.

2 Did he ever have anybody translate this  
3 agreement for him?

4 THE INTERPRETER: Sorry, Counselor, just  
5 because I have to translate every -- I want to make sure  
6 we're not getting confused. You're speaking to him,  
7 correct? Like you? Just because if I translate him --

8 MR. BERMAN: Yeah. Did anybody ever --

9 THE INTERPRETER: Yeah. Thank you.

10 BY MR. BERMAN:

11 Q Did anybody ever translate this document for  
12 you?

13 A This one right here? No. Well, it's just  
14 that my son takes care of everything. He takes care of  
15 everything. I just sign and that's it. He does  
16 everything.

17 Q Okay. Does he recall recording an album for  
18 the band called El Campesino?

19 A Of course I do, by the Originales de San Juan.

20 Q All right. Did he perform on that -- the  
21 recording of that album?

22 MR. BEGAKIS: Objection. Vague.

23 THE INTERPRETER: Again, he is Mr.  
24 Torres, correct? Not --

25 MR. BERMAN: Mr. Torres, yes.